

**Amendments to the Drawings:**

The attached drawing sheets include changes to Figs. 4, 8, and 9. In Fig. 4, the designation “315” is changed to “310” for consistency with the specification. In Fig. 8, several designations are deleted for consistency with the specification. In Fig. 9, the designation “940” is deleted for consistency with the specification. These amendments to the drawings are supported by the embodiments described in the specification.

## **REMARKS/ARGUMENTS**

In the Office Action mailed April 4, 2011, claims 1-15 were rejected. In response, Applicant hereby requests reconsideration of the application in view of the amendments and the below-provided remarks.

For reference, claims 1, 3-12, 14, and 15 are amended to clarify the language of the claims. Also, claim 1 is amended to improve the formatting of the claim. Also, claim 1 is amended to recite the conductive adhesive previously recited in dependent claim 2. Consequently, claim 13 is canceled. Claims 3 and 4 are amended to depend from claim 1. Claim 9 is amended to depend from claim 8. Claims 10 and 11 are amended to depend from claim 9. Claim 12 is amended to recite the conductive adhesive previously recited in dependent claim 13. Consequently, claim 13 is canceled. Claim 15 is amended to recite a conductive adhesive. These amendments are supported by the subject matter described in the specification and the original language of the claims.

### Request for Efficient Examination

As a preliminary matter, Applicants request that the Examiner provide references to specific portions of the disclosure of the cited reference. While the Examiner has generally referred to the cited reference by name, it is very difficult to understand the reasoning behind the various rejections, especially when there is not an apparent correlation between the claim limitations of the present application and the disclosure of the cited reference. Accordingly, Applicants respectfully request that the Examiner provide more specific citations to paragraphs, figures, and so forth, in future communications.

### Claim Rejections under 35 U.S.C. 112

Claims 1-15 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicant appreciates the Examiner's review of the language of the claims, which is amended herein to address the various concerns raised by the Examiner. In light of the amendments presented herein, Applicant

respectfully requests that the rejections under 35 U.S.C. 112, second paragraph, be withdrawn.

Claim Rejections under 35 U.S.C. 102 and 103

Claims 1-15 were rejected based on one or more cited references. The cited reference(s) relied on in these rejections include:

Hikita et al. (U.S. Pat. No. 6,232,668, hereinafter Hikita)

In particular, claims 1-15 were rejected under 35 U.S.C. 102(b) as being anticipated by Hikita. However, Applicant respectfully submits that these claims are patentable over Hikita for the reasons provided below.

Independent Claim 1

Claim 1 is patentable over Hikita because Hikita does not disclose all of the limitations of the claim. Claim 1 recites:

An integrated circuit device assembled in a package having a plurality of die including a first device and an additional device, the IC comprising:

a substrate;

a first device die, having bonding pads including ground connections, the first device die attached to the substrate;

an additional device die having bonding pads including ground connections, the additional device die disposed on top of the first device die, the additional device die attached to the first device die, wherein the ground connections of the first device die are connected to the ground connections of the additional device die; and

a conductive adhesive disposed between the first device die and the second device die, wherein the ground connections of the first device die are connected to the ground connections of the additional device die with the conductive adhesive.

(Emphasis added.)

In contrast, Hikita does not disclose all of the limitations of the claim. In particular, Hikita does not disclose a conductive adhesive disposed between the first device die and the second device die. Although Hikita describes a chip-on-chip structure,

Hikita does not disclose using a conductive adhesive to make electrical contact between the mother or primary chip and the daughter or secondary chip. Moreover, this assertion is inconsistent with the actual disclosure of Hikita. Hikita specifically describes press-bonding the primary and secondary chips together. Hikita, col. 3, lines 56-60. The disclosure of the primary and secondary chips being press-bonded is insufficient to disclose using a conductive adhesive between the primary and secondary chips of the chip-on-chip structure. Furthermore, it appears that there would be no additional benefit or reason to use a conductive adhesive since Hikita already describes using press-bonding to bond the primary and secondary chips.

For the reasons presented above, Hikita does not disclose all of the limitations of the claim because Hikita does not disclose a conductive adhesive disposed between the first device die and the second device die, as recited in the claim. Accordingly, Applicant respectfully asserts claim 1 is patentable over Hikita because Hikita does not disclose all of the limitations of the claim.

#### Independent Claims 12 and 15

Applicant respectfully asserts independent claims 12 and 15 are patentable over the cited reference at least for similar reasons to those stated above in regard to the rejection of independent claim 1. Each of these claims recites subject matter which is similar to the subject matter of claim 1 discussed above. Although the language of these claims differs from the language of claim 1, and the scope of each claim should be interpreted independently of other claims, Applicant respectfully asserts that the remarks provided above in regard to the rejection of claim 1 also apply to the rejections of these claims.

#### Dependent Claims

Claims 3-11 and 14 depend from and incorporate all of the limitations of the corresponding independent claims 1 and 12. Applicant respectfully asserts these dependent claims are allowable based on allowable base claims. Additionally, each of these dependent claims may be allowable for further reasons.

## CONCLUSION

Applicant respectfully requests reconsideration of the claims in view of the amendments and the remarks made herein. A notice of allowance is earnestly solicited.

At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account **50-4019** pursuant to 37 C.F.R. 1.25. Additionally, please charge any fees to Deposit Account **50-4019** under 37 C.F.R. 1.16, 1.17, 1.19, 1.20 and 1.21.

Respectfully submitted,

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